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18 UNITED STATES DISTRICT COURT
19 CENTRAL DISTRICT OF CALIFORNIA

20 IN RE CONAGRA FOODS, INC.

21 CASE NO. 11-CV-05379MMM (AGRX)
22 MDL NO. 2291

23 CLASS ACTION

24 PLAINTIFFS' RESPONSE TO
25 CONAGRA'S DECEMBER 16, 2014
26 FILING OF SUPPLEMENTAL
27 AUTHORITY

28 PLAINTIFFS' RESPONSE TO CONAGRA'S DECEMBER 16, 2014 FILING OF SUPPLEMENTAL
AUTHORITY

CASE NO. CV 11-05379-MMM (AGRx)

PLAINTIFFS' RESPONSE TO CONAGRA'S DECEMBER 16, 2014 FILING
OF SUPPLEMENTAL AUTHORITY

Plaintiffs, by their undersigned counsel, respectfully submit that to the extent the Court finds the decisions submitted by ConAgra on December 16, 2014 to be relevant to its further consideration of Plaintiffs' Amended Motion for Class Certification (*see* Notice of Recent Authority, Doc. 430), Plaintiffs respectfully direct the Court to Exhibit A in their November 13, 2015 *Ex Parte Application for Leave to Submit Memorandum Updating Court on Recent Decision in Brazil v. Dole* (Doc. 418), which distinguishes this matter from those aspects of *Brazil v. Dole* upon which Judge Koh granted summary judgment in the defendant's favor. Many of the same points Plaintiffs discussed in their November 13, 2015 *Ex Parte* application concerning *Dole* also apply to distinguish this matter from the newly-submitted class decertification decision in *Werdebaugh v. Blue Diamond Growers*, Case No. 12-CV-2724-LHK.

DATED: December 18, 2014

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